## REMARKS

Reconsideration and allowance in view of the foregoing amendments and the following remarks are respectfully requested.

Claims 1-27 are pending in the application, claims 1, 6, 7, 9, 14 and 15 having been amended and claims 17-27 having been added.

The Examiner objected to claims 1 and 9, indicating that "displaying at least a portion of the electronic document to the user as an immersive reading page" should be changed to "displaying at least a portion of the electronic document to a user as an immersive reading page". Applicants amended claims 1 and 9 accordingly and therefore, respectfully request that the objection be withdrawn.

The Examiner indicated that language such as, "For example" should be avoided in the Abstract. Applicants amended the Abstract accordingly.

The Examiner rejected claims 1-16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent 6,081,814 to Mangat et al. (Mangat) in view of U.S. Patent 5,835,919 to Stern et al. (Stern). Applicants respectfully traverse the rejection. The claims have been amended, however, the claims were not amended to overcome prior art. Further, Applicants submit that the amendments to the claims do not narrow the scope of the claims.

Mangat relates to computer applications using or requiring access to documents and files. Particularly, Mangat relates to systems and methods for retrieving and linking documents or files. Mangat discloses creating, maintaining and searching entries, referring to documents, listed in an environment, entries referring to environments in a list of environments, catalogs containing lists of multiple environments, and catalogs of catalogs across a local area network, an internetwork, or across a directory services system. The Examiner admits, on page 2 of the

Office Action, that Mangat does not disclose the immersive reading page mimicking a printed paper, as recited in claim 1. The Examiner relies on Stern to disclose this feature.

Stern is directed to a document-centered user interface architecture for a computer system employing parts as the fundamental building block of all documents. Stern provides a uniform interface that enables all different kinds of information-conveying elements to be combined and manipulated within documents in ways that were not previously possible. See Column 2, lines 56-60. Stern teaches that a fundamental building block of a document-centered architecture is a "part". The part is a self-contained element that is comprised of two primary components, its content and a manipulator for that content. The manipulator for the part can be any type of editor or viewer for the contents of the part, and it can be selected by the user, if necessary.

Applicants submit that there is no suggestion or motivation to combine Mangat and Stern. Mangat addresses problems related to retrieving and linking documents or files, while Stern provides an interface simplifying the manipulation and editing of documents having parts. Mangat is totally devoid of any disclosure, teaching or suggestion regarding immersive reading pages mimicking a printed paper page. Stern is merely concerned with providing a simple interface to parts of documents and is totally devoid of any disclosure, teaching or suggestion regarding enhanced functionality. Neither Mangat nor Stern however, provide any incentive or motivation to combine the references in the manner proposed by the Examiner to obtain the claimed invention. It would appear that the Examiner used impermissible hindsight to reject the claims.

As stated in Section 2142 of the MPEP:

To establish a *prima facie* case of obviousness, three basic criteria must be met.

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art (or

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references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art, and not based on Applicant's disclosure.

Applicants submit that because there is no suggestion or motivation to combine the references, the Examiner did not establish a *prima facie* case of obviousness and therefore respectfully requests that the rejection to claims 1-16 be withdrawn.
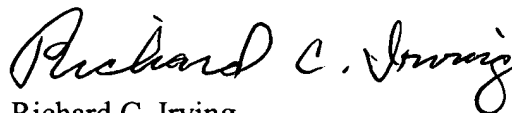
New claims 17-27 depend either from claim 1 or claim 9 and are patentable over the cited prior art, at least for the reasons discussed above regarding claims 1 and 9 and further in view of additional advantageous features recited therein. For example, the cited prior art does not disclose, teach, or suggest the enhanced functionality including highlighting, annotating, drawing, or adding a bookmark indicator, as recited in claims 17-20, respectively.

All rejections and objections having been addressed, Applicants submit that the application is now in condition for allowance, and, a notice to that effect is earnestly solicited.

If any issues remain which could best be resolved by a personal telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the local telephone number listed below.

Should any fees be deemed necessary by the U.S. Patent Office to keep the above

identified application in force, the U.S. Patent Office is authorized to charge such fees, other than

the Issue Fee, to Deposit Account No. 19-0733.

Respectfully submitted,

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Date: May 13, 2002

Version Showing Marked-Up Changes

**IN THE SPECIFICATION**:

The specification was changed as follows:

Page 16, paragraph 2 (starting at line 13 and continuing onto page 17, line 13) was deleted in its entirety and replaced with the following:

-- According to another feature of the invention, an enabling technology is provided in the form of a training mode for permitting the user to learn the transparent association reflected in the immersive reading pages of a document. Referring to FIGURE 8, from within a help and settings control document, a user may access a settings control page 800 which contains links configured to alter settings of the reading application. Here, a number of links, such as SHOW BOOKMARKS, SHOW TEXT NOTES, SHOW DRAWINGS and SHOW HIGHLIGHTS are presented for displaying on the immersive reading pages, a number of indicators corresponding to content interaction functions. In addition, a link entitled SHOW VISUAL GUIDES may be selected to invoke the training mode according to the invention. When the SHOW VISUAL GUIDES link is selected by a user, the immersive reading pages are displayed as shown in FIGURE 9 with visual indicators 910, 912 and 914 to indicate, usually to a new user, that enhanced functionality is associated with the immersive reading page elements. Relative to the page number element 512, a visual indicator 912 is provided to the left of the page number 512 to indicate to the user that intrabook navigational functionality of paging back is associated with the area to the left of the page number 512. Similarly, a visual indicator 910 is provided to the right of the page number 512 to indicate that intrabook navigational functionality of paging forward is associated with the area to the right of the page number 512. Title line 510 is

provided with a visual indicator 914 to indicate to the user that interbook navigational

functionality is associated with the title line elements. --

## IN THE ABSTRACT:

The Abstract of the Disclosure was amended as follows:

-- An apparatus and method for presenting electronic documents to users in the form of

immersive reading pages. Immersive reading pages mimic the presentation that is provided by

printed paper documents. There are no traditional user interface features displayed to the user,

yet the user has access to the enhanced functionality that can be provided by computer-

implemented documents. ~~For example~~ In an illustrative embodiment, the user has access to

intrabook (or inside-the-book), interbook (or outside-the-book) navigational features, and content

interactive features, such as highlighting, annotating, drawing or looking up definitions or

synonyms of words in the document. Enhanced functionality is transparently associated with

elements on the immersive reading page such that the immersive reading page is without visible

indicators of the association. A training mode for permitting the user to learn the transparent

association behind the immersive reading pages provides visual guides to the user. The guides

may be turned off after the user learns the association. –

## IN THE CLAIMS:

The claims were amended as follows:

1. (Amended) In a computer system having a user interface, including a display and a
selection device, a method of displaying an electronic document, the method comprising the
steps of:

displaying at least a portion of the electronic document to ~~the~~ a user as an immersive
reading page, the immersive reading page mimicing a printed paper page;

associating with an element of the immersive reading page enhanced functionality; and

providing the user access to the enhanced functionality in response to the user selecting
the element of the immersive reading page.

6. (Amended) The method of claim 5̶1, wherein the element is a title line and the step of associating comprises associating interbook navigational functionality with the title line.

7. (Amended) The method of claim 6̶1, wherein the element is content and the step of associating comprises associating content interaction functionality with the content.

9. (Amended) A computer-readable medium having stored thereon computer-executable instructions for performing a method of displaying an electronic document, the method comprising the steps of:

displaying at least a portion of the electronic document to the̶ a user as an immersive reading page, the immersive reading page mimicing a printed paper page;

associating with an element of the immersive reading page enhanced functionality; and

providing the user access to the enhanced functionality in response to the user selecting the element of the immersive reading page.

14. (Amended) The computer-readable medium of claim 1̶3̶9, wherein the element is a title line and the step of associating comprises associating interbook navigational functionality with the title line.

15. (Amended) The computer-readable of claim 1̶5̶9, wherein the element is content and the step of associating comprises associating content interaction functionality with the content.

New claims 17-27 were added.
A new abstract of the disclosure was added and is attached hereto on a separate sheet.